

Morse, Bob

From: Battaglia, Randall W CIV USARMY CENAN (US) <Randy.W.Battaglia@usace.army.mil>
Sent: Wednesday, October 10, 2018 7:18 AM
To: Melissa Sweet (Melissa.Sweet@dec.ny.gov); Morse, Bob
Subject: FW: Draft PFAS ESI Work Plan_v2
Attachments: Draft PFAS ESI Work Plan_v2-Environ-Hodges-20181005.docx

Melissa/Bob,

The PFAS workplan was sent out prematurely by Parsons, so you will be receiving it soon. The premature document was not revised for the two statements below.

So for your information-

We had barreled IDW soil and water at all our sites, sampled, and placed the IDW on site at the respective sites. We all agreed to place any boring soil and groundwater on sites where it was sampled.

We had deep wells paired with a shallow well at all sites, including SEAD 25. The TCE was a concern as a dnapi, but there were non-detects in the lower aquifer.

Melissa, as the state has been sampling private wells near the airfield, have they sampled any private wells on the east side of the Depot?

My primary office phone number is now: 347-213-1565

Randy Battaglia
Project Manager
Seneca AD BRAC Environmental Coordinator/Caretaker New York District CENAN-PP-E

-----Original Message-----

From: Battaglia, Randall W CIV USARMY CENAN (US)
Sent: Tuesday, October 09, 2018 10:12 AM
To: 'Badik, Beth' <Beth.Badik@parsons.com>; Hodges, Barry A CIV USARMY CEHNC (US) <Barry.A.Hodges@usace.army.mil>; Pommerenck, Derek A CIV USARMY CEHNC (US) <Derek.Pommerenck@usace.army.mil>
Cc: Belanger, Todd <Todd.Belanger@parsons.com>; Johnson, Betina M CIV USARMY CEHNC (US) <Betina.V.Johnson@usace.army.mil>; Briggs, James E CIV USARMY HQDA ACSIM (US) <james.e.briggs2.civ@mail.mil>; Roos, Allen D NAN02 (Allen.D.Roos@usace.army.mil) <Allen.D.Roos@usace.army.mil>
Subject: RE: Draft PFAS ESI Work Plan_v2

Beth,

These issues exist only with Huntsville and are not issues or concerns with the regulatory agencies. Technical comments typically do not involve individuals and PDT agreement.

Comment/question #1:

1) Randy - please confirm, but I believe that the tweaked IDW language should be acceptable to all parties. "all wastes will be handled and disposed of if necessary in accordance with all federal and state laws and regulations"

Response:

- This is acceptable.

- PFOAs are neither listed nor characteristic hazardous wastes.
- The state regulatory agency is an authorized state for RCRA; this is the New York State Department of Environmental Conservation, NYSDEC, not NYSDEP as stated in the comments.
- The Parsons IDW plan, as I have stated before, obtained agreement with the regulatory agencies was made during previous BCT meetings, IDW plans and correspondence that IDW will be placed near the sampling point for all CERCLA sites on Seneca. I neither have the time nor responsibility to prove or document this for the "team" that is supposed to be supporting the Army in this program. Without checking, I believe the CY00 time frame is correct.

Comment/Questions #2:

2) All: The impact of this issue is whether a deeper well(s) is required. My understanding is that Barry is noting that this must be addressed, but it can be done at a later time and a plan for (and if) deeper wells does not need to be established in this work plan. My understanding of the needed action is for Parsons to update the response and the text.

This is the proposed updated text.

"Vertical connection tests performed on six well pairs indicate that the till/weathered shale aquifer shows very small displacement, such that it was hard to measure; however, the degree to which the upper and lower aquifer are connected is unknown at this time is not significantly connected to the competent shale aquifer below it (Parsons, 1998)."

Response:

- This text raises questions. The SEAD 25 and SEAD 26 sites and all others with groundwater concerns had deep wells installed in pairs. At SEAD 25,26 and all others, there was no hydraulic connection or contamination found in the lower aquifers. Huntsville likely will not accept this data as "it is old".

-SEAD 25 had dnapi concerns with TCE, as well as BTEX as priority COPCs. No contamination was found at the lower aquifer and all wells were agreed to cease sampling and were closed.

-The statement in the text should read as follows:

"The RI at SEAD 25 and 26 had deep wells installed in pairs with shallow aquifer wells. Contamination at SEAD 25 included TCE and dnapi concerns, and BTEX at SEAD 25 and 26. No contamination was found in any deep wells during the RI. All Parties since have agreed there was no hydraulic connection and the deep wells at these sites and the well pairs were closed. Groundwater monitoring continued in the shallow aquifer at SEAD 25 only. Therefore, PFOAs are being sampled in the shallow aquifer at this time to determine the extent of contamination. "

Derek,

Please direct the contractor to make these changes and submit the workplan to the regulators.

My primary office phone number is now: 347-213-1565

Randy Battaglia

Seneca AD BRAC Environmental Coordinator/Caretaker

-----Original Message-----

From: Badik, Beth [mailto:Beth.Badik@parsons.com]

Sent: Friday, October 05, 2018 3:19 PM

To: Hodges, Barry A CIV USARMY CEHNC (US) <Barry.A.Hodges@usace.army.mil>; Pommerenck, Derek A CIV USARMY CEHNC (US) <Derek.Pommerenck@usace.army.mil>

Cc: Battaglia, Randall W CIV USARMY CENAN (US) <Randy.W.Battaglia@usace.army.mil>; Belanger, Todd <Todd.Belanger@parsons.com>

Subject: [Non-DoD Source] RE: Draft PFAS ESI Work Plan_v2

1)

Randy - please confirm, but I believe that the tweaked IDW language should be acceptable to all parties. "all wastes will be handled and disposed of if necessary in accordance with all federal and state laws and regulations"

2)

All: The impact of this issue is whether a deeper well(s) is required. My understanding is that Barry is noting that this must be addressed, but it can be done at a later time and a plan for (and if) deeper wells does not need to be established in this work plan. My understanding of the needed action is for Parsons to update the response and the text.

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"Vertical connection tests performed on six well pairs indicate that the till/weathered shale aquifer shows very small displacement, such that it was hard to measure; however, the degree to which the upper and lower aquifer are connected is unknown at this time is not significantly connected to the competent shale aquifer below it (Parsons, 1998)."

BARRY/RANDY/DEREK:

Please let me know that this updated text is acceptable.

-----Original Message-----

From: Hodges, Barry A CIV USARMY CEHNC (US) <Barry.A.Hodges@usace.army.mil>

Sent: Friday, October 05, 2018 2:15 PM

To: Pommerenck, Derek A CIV USARMY CEHNC (US) <Derek.Pommerenck@usace.army.mil>; Badik, Beth <Beth.Badik@parsons.com>

Cc: Battaglia, Randall W CIV USARMY CENAN (US) <Randy.W.Battaglia@usace.army.mil>

Subject: Draft PFAS ESI Work Plan_v2

Beth,

Derek approved me to just send these to all for the sake of speed.

Mostly acceptances. Really only 2 issues left to work out

1) I need the new IDW lingo tweaked slightly. I have included a suggested pattern.

2) Neither myself nor the CX Geologist (Hugh Reick) are able to accept that the shallow GW is not connected to the deep potable GW in such a complete manner that we can just assume that nothing will get to that water from the shallow contaminated GW. In reality it will get there...simply in a much retarded time span. I specifically asked Hugh if we could expect any attenuation. 50/50 answer. Hugh said until it exits the silt filled matrix of the till crammed voids, no. Everything is moving through it slowly all together, so when it finally does exit the other side of the till layer it will not have attenuated largely, but as it enters the much higher GW regime that a GW drinking well indicates is down there...then it will be attenuated, but at an unknowable level. This will be a concern for the future, but we can't just say they are not connected. There may in the end be enough attenuation that we never present a risk to anyone...but that conclusion cannot be an assumption. If the results of this indicate that we don't have high enough levels to worry about this, then well and good, if not, we will have to answer the question. That can definitely wait for some other time though. Let this work guide that outcome.

Barry Hodges

Technical Manager / Chemist / RCRA Waste SME Environmental Protection and Utilities Branch (CEHNC-EDC-E)

Huntsville Engineering & Support Center

4820 University Square

Huntsville, AL 35816-1822

Office - 256-895-1894

US Govt. Cell - 256-503-0153

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